Arent Fox

May 18, 2012

VIA ECFS

Marlene H. Dortch Secretary **Federal Communications Commission** 445 12th Street, S.W. Washington, D.C. 20554

Stephanie A. Joyce

Attorney 202.857.6081 DIRECT 202.857.6395 FAX joyce.stephanie@arentfox.com

Re: Notice of Permitted Ex Parte Meeting, WC Docket No. 09-144 and CC Docket No. 96-128

Dear Ms. Dortch:

On May 17, 2012, Securus Technologies, Inc. met with the following persons at the Commission to discuss the Securus Petition for Declaratory Ruling and the rate issues contained in the petitions of Martha Wright:

> Michael Steffen – Legal Advisor to Chairman Genachowski Deena Shetler – Associate Bureau Chief, Wireline Competition Bureau Nicholas Alexander – Deputy Division Chief, Pricing Policy Division, Wireline Competition Bureau

Representing Securus were Dennis J. Reinhold, Vice President and General Counsel, and the undersigned. This disclosure is made in compliance with 47 C.F.R. § 1.1206(a)(3).

Securus explained the security concerns that gave rise to its Petition which is under consideration in WC Docket No. 09-144. It noted that these security concerns have not been ameliorated by call diverters, and that correctional authorities require that attempts to use call diversion be blocked. Securus also related the information it learned regarding the Federal Bureau of Prisons and its arrangement with Millicorp. See WC Docket No. 09-144, Letter from Stephanie A. Joyce to Marlene H. Dortch, FCC (Sept. 15, 2011); Letter from Stephanie A. Joyce to Marlene H. Dortch, FCC (Oct. 20, 2011).

With regard to inmate calling rates (CC Docket No. 96-128), Securus noted that it recently has won high-volume contracts that enable it to provide very low rates, such as the Missouri Department of Corrections contract. Securus referred Mr. Steffen to the ex parte filing that it made on May 10, 2012.

Arent Fox

Securus listed several factors that cause inmate calling rates to be higher than residential telephone service, including the costs of bad debt, research and development, and site commissions. Securus explained that site commissions are the product of a public policy decision made by correctional authorities, and in some cases state legislatures, to fund prison operations and inmate welfare funds through the inmate telecommunications system. Securus explained that, as a vendor, it cannot prohibit the imposition of site commissions. It further stated that site commissions are a direct cost of service and should not be considered as profit.

Finally, Securus stated that it has met with the public interest groups that have shown an interest in inmate calling rates, and that it offered to hold another such meeting soon.

Large, foam-backed versions of the attached documents were shown to Mr. Steffen during the meeting.

Sincerely,

s/Stephanie A. Joyce

Counsel to Securus Technologies, Inc.

Attachments